IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

WEATHERFORD U.S., L.P. and WEATHERFORD TECHNOLOGY HOLDINGS, LLC,	 § § Civil Action No. 23-cv-03416 §
Plaintiffs,	§ § §
VS.	§
	§
IRON IQ, INC.,	§
	§
Defendant.	§

[PROPOSED] ORDER GRANTING PLAINTIFFS WEATHERFORD U.S., L.P. AND WEATHERFORD TECHNOLOGY HOLDINGS, LLC'S MOTION FOR EXPEDITED DISCOVERY

Pending before the Court is Plaintiffs Weatherford U.S., L.P. and Weatherford Technology Holdings, LLC emergency motion for expedited discovery. The Court has considered and **GRANTS** the motion and **ORDERS** that:

Within 5 calendar days from the date of this Order, Defendant Iron IQ, Inc. shall produce, under Fed. R. Civ. P. 33 and 34 (as permitted by Fed. R. Civ. P. 26(d)(1)), complete and verified responses to the following interrogatories and the related production of documents:

Interrogatory No. 1: Provide complete responses to the questions listed in Weatherford's August 30, 2023 correspondence (see Verified Complaint at Ex. 6).

Interrogatory No. 2: What was Damon Baillie's purpose for downloading CygNet® SCADA platform version 9.6 on August 18, 2023?

Interrogatory No. 3: Why did Damon Baillie use login credentials from Caerus Oil & Gas in order to download CygNet® SCADA platform version 9.6 on August 18, 2023?

Interrogatory No. 4: Describe in detail each use by Iron-IQ of the CygNet® SCADA

platform version 9.6 downloaded on August 18, 2023, by Damon Baillie.

Interrogatory No. 5: Identify all customers that Iron-IQ has migrated from Iron-IQ's

SCADA platform from Weatherford's CygNet® SCADA platform in the last three years.

Document Request No. 1: Produce all documents and/or ESI related to Interrogatories

Nos. 1-5.

Then, within five days of producing verified interrogatory responses and production of

documents, Iron IQ shall make CEO Michael Ligrani and employee Damon Baillie available for

deposition under Fed. R. Civ. P. 30(b)(1), and shall make one or more corporate representatives

available for deposition to testify under Fed. R. Civ. P. 30(b)(6) on behalf of Iron IQ on the

following topics:

Deposition Topic No. 1: Information sought in Weatherford's August 30, 2023

correspondence (see Verified Complaint at Ex. 6).

Deposition Topic No. 2: Iron-IQ's responses to Interrogatories Nos. 1-5.

Deposition Topic No. 3: Documents produced by Iron-IQ in response to Interrogatories

Nos. 1-5 or Document Request No. 1.

SIGNED at Houston, Texas, this day of September 2023.

KENNETH M. HOYT UNITED STATES DISTRICT JUDGE